UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- X

JENNIFER ECKHART and CATHY AREU,   :

                 Plaintiffs,   :   Civil Case No. 1:20-cv-05593

         against   :

FOX NEWS NETWORK, LLC, ED HENRY,   :
SEAN HANNITY, TUCKER CARLSON and   :
HOWARD KURTZ, in their individual and   :
professional capacities,   :

                 Defendants.
- X

DECLARATION OF GIANNO CALDWELL IN SUPPORT OF DEFENDANTS' RULE 11 MOTION FOR SANCTIONS

I, Gianno Caldwell, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I am the founder of Caldwell Strategic Consulting, a bipartisan firm headquartered in Washington, DC, providing strategic advice and consulting in the area of public affairs.

2. I am a paid contributor to Fox News Network, LLC, providing commentary as a political analyst on the Fox News Channel, among other services. I also hosted the Fox Nation documentary, "The New Battle for Chicago." I am fully familiar with the facts and circumstances set forth herein and make this Declaration in Support of Defendants' Rule 11 Motion for Sanctions.

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3. Exhibit A is a true and correct copy of text messages exchanged between myself and

Plaintiff Cathy Areu from May 31, 2020 until July 3, 2020.

Dated: _8/28/20_

By: _____

Gianno Caldwell